

DEES PAPER COMPANY, INC.,
a corporation,

Plaintiff,

-vs-

CURRIERS RIVER PARK EGG
FARM,

Defendant.

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IN THE CIRCUIT COURT

OF

BALDWIN COUNTY,

ALABAMA

AT LAW

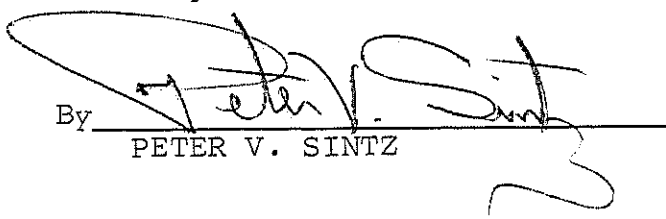
CASE NUMBER 10,076

COMPLAINT

The Plaintiff claims of the Defendant ONE THOUSAND FIVE HUNDRED NINETY TWO AND 30/100 (\$1,592.30) DOLLARS, due from him by itemized verified account between the Defendant and Dees Paper Company, Inc., on the fourth day of October, 1971, which sum of money, with the interest thereon, is still unpaid.

BROWN, HUDGENS, FULFORD, SINTZ
AND RICHARDSON
Attorneys for Plaintiff

By


PETER V. SINTZ

PLEASE SERVE DEFENDANT:

Mr. Currier
CURRIERS RIVER PARK EGG FARM
Fairhope, Alabama 36532

FILED

OCT 18 1971

EUNICE B. BLACKMON CLERK

BROWN, HUDGENS, FULFORD,
SINTZ & RICHARDSON
210 VAN ANTWERP BUILDING
MOBILE, ALABAMA 36602

PLEASE REMIT TO

Dees Paper Co., Inc.
P. O. Box 7325
Mobile, Ala. 36607

THIS IS A STATEMENT OF YOUR ACCOUNT AS OF THE DATE SHOWN BELOW.
ANY CHARGES OR PAYMENTS SHOULD BE MADE TO THIS
DATE WILL APPEAR ON NEXT MONTH'S STATEMENT.

DATE October 4, 1971

AMOUNT ENCLOSED \$

TO: Curriers River Park
Egg Farm
Fairhope, Ala. 36532 101229-0

DATE	DESCRIPTION OF SERVICE	CHARGE	CREDIT	BALANCE
	Previous Balance			472.50
4/19/71	Paper Goods 45242	580.00		
5/26/71	Paper Goods 52524	1,539.80		
6/25/71	Payments		400.00	
8/5/71	Payments		600.00	
	Balance now due			1,592.30

SUMMONS AND COMPLAINT

Moore Printing Co. - Bay Minette, Ala.

STATE OF ALABAMA
Baldwin County

Circuit Court, Baldwin County

No. 10,076

.....TERM, 19.....

TO ANY SHERIFF OF THE STATE OF ALABAMA:

You Are Hereby Commanded to Summon Curriers River Park Egg Farm

to appear and plead, answer or demur, within thirty days from the service hereof, to the complaint
filed in the Circuit Court of Baldwin County, State of Alabama, at Bay Minette, against.....

Curriers River Park Egg Farm, Defendant.....

by Dees Paper Company, Inc., a corporation.....

....., Plaintiff.....

Witness my hand this 18th day of October 1971.

Eunice B. Bla. K..., Clerk

No. 10,076

Page.....

STATE OF ALABAMA

Baldwin County

CIRCUIT COURT

DEES PAPER COMPANY, INC. A CORPORATION

Plaintiffs

vs.

Norman J.
CURRIERS RIVER PARK EGG FARM

Defendants

SUMMONS AND COMPLAINT

Filed October 18, 1971

Eunice B. Blackmon Clerk

FILED

OCT 18 1971

EUNICE B. BLACKMON CIRCUIT CLERK

Brown, Hudgens, Fulford, Smith & Richardson
Suite 210 Van Antwerp Building; Mobile, Alabama 36602

Defendant's Attorney

OCT 18 1971

JAY L. SHERIFF

Defendant lives at

Received In Office

OCT 18 1971

19.....

JAY L. SHERIFF

Sheriff

I have executed this summons

this 2300m 1971

by leaving a copy with

Curriers River Park Egg Farm

Sheriff claims 70 miles

Ten Cents per mile Total \$ 7.00

JAY L. SHERIFF

BY *W. Crook*
DEPUTY SHERIFF

Sheriff

W. Crook Deputy Sheriff

BROWN, HUDGENS, FULFORD, SINTZ & RICHARDSON
ATTORNEYS AT LAW

SUITE 210 VAN ANTWERP BUILDING

MOBILE, ALABAMA

36602

ALTON R. BROWN, JR.
A. NEIL HUDGENS
JAMES E. FULFORD
PETER V. SINTZ
JOHN D. RICHARDSON, III
J. GEORGE WHITFIELD, JR.
CLAUDE D. HARRELL

AREA CODE 205
432-2792

March 30, 1972

Mrs. Eunice B. Blackmon
Circuit Clerk of Bladwin County
Bay Minette, Alabama 36507

Re: Case no. 10,076
Dees Paper Company vs. Curriers River Park Egg Farm
Our File : 71 6766 PVS

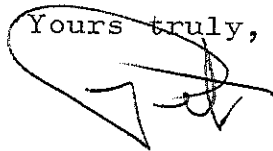
Dear Mrs. Blackmon:

You previously advised us that service was had against the defendant on October 23, 1971. Our file reflects that no answer has been filed on behalf of the defendants. It would appear that the case is now ready for a default.

The suit was filed on an itemized verified complaint with an affidavit and copy of the account attached. We ask that you please present the claim to Judge Mashburn and we respectfully request a judgment in the amount of \$1,592.30. At the present time we will waive any interest that might be owing on the judgment. We also ask that you please advise us when the judgment is entered.

We thank you very much for your assistance and help in this matter.

Yours truly,



Peter V. Sintz
For the Firm
PVS/cdp

PLEASE REMIT TO:

Dees Paper Co., Inc.
P. O. ox 7325
Mobile, Ala. 36607

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101229
 CURRIERS RIVER PARK EGG FARM
 FAIRHOPE
 ALA. 36532.

ALA 36532

.00

DEC 1 70

.00

DEES

.00

DEC 1 70

38,999

725.00

725.00

.00

725.00

DEC 17 70

37,798

472.50

1,197.50

.00

1,197.50

DEC 30 70

6,731

725.00

472.50

STATE OF ALABAMA)

COUNTY OF Mobile)

AFFIDAVIT

Before me, David L. Holmes, a Notary Public
in and for said State and County, personally appeared this
13th day of October, who having been first duly sworn,
deposes and says that he is General Manager of
Dees Paper Company, Inc., the Claimant, and
that he has full and complete knowledge of the account against
Curriers River Park Egg Farm, and that the
foregoing itemized statement of the said account that is
attached hereto showing the amount justly due, \$ 1,592.30,
is true and correct after allowing all proper credits, and that
he is duly authorized to make this affidavit.

DEES PAPER COMPANY, INC.

David L. Holmes
David L. Holmes

SUBSCRIBED and SWORN TO before
me on this 13th day of October 1971,

196 .

James H. [Signature]
NOTARY PUBLIC

STATE OF ALABAMA)

COUNTY OF Mobile)

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Before me, David L. Holmes, a Notary Public
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David L. Holmes

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Notary Public
NOTARY PUBLIC

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COUNTY OF Mobile)

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